The Southwater Infant Academy

CCTV Policy

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1 Introduction

1.1 The Southwater Infant Academy uses closed circuit television (CCTV) images to reduce crime and monitor the academy buildings and site in order to help provide a safe and secure environment for pupils, staff and visitors, and to prevent the loss or damage to academy property.

1.2 The system comprises a number of fixed cameras.

1.3 The system does not have sound recording capability.

1.4 The CCTV system is owned and operated by the academy, the deployment of which is determined by the academy's Senior Leadership Team.

1.5 The CCTV is intermittently monitored centrally from the academy offices by the Office Staff.

1.6 Any proposed changes to CCTV monitoring will be subject to consultation with staff and the academy community.

1.7 The academy's CCTV Scheme is registered with the Information Commissioner under the terms of the Data Protection Act 2018 (DPA). The use of CCTV and the associated images is covered by the DPA. This policy outlines the academy's use of CCTV and how it complies with the Act.

1.8 All authorised operators and employees with access to images are aware of the procedures that need to be followed when accessing the recorded images. All operators are trained by the data controller (Headteacher) in their responsibilities under the CCTV Code of Practice. All employees are aware of the restrictions in relation to access to, and disclosure of, recorded images.

2 Statement of Intent

2.1 The academy complies with Information Commissioner's Office (ICO) CCTV Code of Practice to ensure it is used responsibly and safeguards both trust and confidence in its continued use. The Code of Practice is published at:
https://ico.org.uk/media/for-organisations/documents/1542/cctv-code-of-practice.pdf

2.2 CCTV warning signs will be clearly and prominently placed at all external entrances to the academy, including academy gates if coverage includes outdoor areas. Signs will contain details of the purpose for using CCTV (see appendix B for an example). In areas where CCTV is used, the academy will ensure that there are prominent signs placed at both the entrance of the CCTV zone and within the controlled area.

2.3 The planning and design has endeavoured to ensure that the CCTV system will give maximum effectiveness and efficiency but it is not possible to guarantee that it will cover or detect every single incident taking place in the areas of coverage.

3 Siting the Cameras

3.1 Cameras will be sited so they only capture images relevant to the purposes for which they are installed (described above) and care will be taken to ensure that reasonable privacy expectations are not violated. The Academy will ensure that the location of equipment is carefully considered to ensure that images captured comply with the DPA.

3.2 The academy will make every effort to position cameras so that their coverage is restricted to the academy premises, which includes outdoor areas.

3.3 CCTV will not be used in classrooms but, in exceptional cases, the Senior Leadership Team will consider the use of CCTV in areas within the academy that have been identified by staff and pupils as not being easily monitored.

3.4 Members of staff should have access to details of where CCTV cameras are situated, with the exception of cameras placed for the purpose of covert monitoring (see Part 4, below).

4 Covert Monitoring

4.1 The academy may, in exceptional circumstances, set up covert monitoring. For example:
i) Where there is good cause to suspect that an illegal or unauthorised action(s), is taking place, or where there are grounds to suspect serious misconduct;

ii) Where notifying the individuals about the monitoring would seriously prejudice the reason for making the recording.

4.2 In these circumstances authorisation must be obtained from a member of the senior leadership team.

4.3 Covert monitoring must cease following completion of an investigation.

4.4 Cameras sited for the purpose of covert monitoring will not be used in areas which are reasonably expected to be private, for example toilet cubicles. Legal advice will be sought where covert monitoring is proposed.

5 Storage and Retention of CCTV images

5.1 Recorded data will not be retained for longer than is necessary and will be retained in line with the academy retention schedule. While retained, the integrity of the recordings will be maintained to ensure their evidential value and to protect the rights of the people whose images have been recorded.

5.2 All retained data will be stored securely.

6 Access to CCTV images

6.1 Access to recorded images will be restricted to those staff authorised to view them and will not be made more widely available. Supervising the access and maintenance of the CCTV system is the responsibility of the Head Teacher. The Head Teacher may delegate the administration of the CCTV system to another staff member. When CCTV recordings are being viewed, access will be limited to authorised individuals on a need-to-know basis.

7 Subject Access Requests (SAR)

7.1 Individuals have the right to request access to CCTV footage relating to themselves under the DPA.

7.2 All requests should be made in writing to office@southwaterinfants.co.uk. Individuals submitting requests for access will be asked to provide sufficient information to enable the footage relating to them to be identified. For example, date, time and location.

7.3 The academy will respond to requests within one month of receiving the request but if a request is received outside of the school term this may not be possible.

7.4 The academy reserves the right to refuse access to CCTV footage where this would prejudice the legal rights of other individuals or jeopardise an on-going investigation, or where another exemption applies under the DPA.

7.5 The academy will seek advice from its data protection officer (DPO) when dealing with SARs.

8 Access to and Disclosure of Images to Third Parties

8.1 There will be no disclosure of recorded data to third parties other than to authorised personnel such as the Police and service providers to the academy where these would reasonably need access to the data (e.g. investigators).

8.2 If an order is granted by a court for disclosure of CCTV images, then this should be complied with. However very careful consideration must be given to exactly what the court order requires. If there are any concerns as to disclosure, then the data protection officer should be contracted in the first instance and appropriate legal advice may be required.

8.3 Requests should be made in writing to office@southwaterinfants.co.uk.

8.4 The data may be used within the academy's discipline and grievance procedures as required, and will be subject to the usual confidentiality requirements of those procedures.

8.5 Advice will be sought from the academy DPO where necessary.

9 Complaints

9.1 Complaints and enquiries about the operation of CCTV within the academy should be directed to office@southwaterinfants.co.uk in the first instance.

10 Data Protection Impact Assessments and Privacy by Design

10.1 CCTV has the potential to be privacy intrusive. The academy will perform a Data Protection impact Assessment when installing or moving CCTV cameras to consider the privacy issues involved with using new surveillance systems to ensure that the use is necessary and proportionate and address a pressing need identified.

11 Responsibilities

11.1 The Headteacher is the overall manager of the CCTV system and is responsible for ensuring the objectives and principles set out in this policy are upheld. Office staff have day-to-day responsibility for the monitoring, operation and evaluation of the CCTV system.

12 Policy Review

12.1 This policy will be revised annually. The Headteacher is responsible for monitoring and reviewing this policy. In addition, changes to legislation, national guidance, codes of practice or commissioner advice may trigger interim reviews.

13 Links with other policies

13.1 This CCTV policy is linked to the academy:

- Data Protection Policy
- Freedom of Information Policy
- Acceptable use policy
- Safeguarding and Child Protection policy
- GDPR privacy notices

Appendix A - Checklist
This CCTV system and the images produced by it are controlled by the Headteacher who is responsible for how the system is used..

The Southwater Infant Academy has determined the need for CCTV for the prevention and detection of crime and for the protection of the academy community. It will not be used for other purposes. We conduct an annual review of CCTV and its use.

Organisations using CCTV for the purposes of crime prevention need to pay a data protection fee to the Information Commissioner's Office (ICO), which the academy already pays annually as organisations (including schools) that process personal data are required to pay the data protection fee.

	Checked (date)	By (name)	Date of Next Review
Annual data protection fee has been paid to the ICO.	Sept 26	CC	Sept 27
There is a named individual who is responsible for the operation of the system.	Sept 26	CC	Sept 27
A system is in place which produces clear images which the law enforcement bodies (usually the police) can use to investigate crime and these can easily be taken from the system when required.	Sept 26	CC	Sept 27
Staff and members of the academy community will be consulted about any proposed consequential changes to the CCTV system.	Sept 26	CC	Sept 27
Cameras have been sited so that they provide clear images.	Sept 26	CC	Sept 27
Cameras have been positioned to avoid capturing the images of persons not on the premises.	Sept 26	CC	Sept 27
There are visible signs showing that CCTV is in operation.	Sept 26	CC	Sept 27
Images from the CCTV system are securely stored, where only a limited number of authorised persons may have access to them.	Sept 26	CC	Sept 27
The recorded images will only be retained long enough for any incident to come to light (e.g. for a theft to be noticed) and the incident to be investigated.	Sept 26	CC	Sept 27
Except for law enforcement bodies, images will not normally be provided to third parties.	Sept 26	CC	Sept 27
The Academy knows how to respond to individual requests for copies of their own images. If unsure the academy will seek advice from its Data Protection Officer as soon as a request is made.	Sept 26	CC	Sept 27
Regular checks are carried out to ensure that the system is working properly and produces high quality images.	Sept 26	CC	Sept 27

Appendix B - CCTV Signage

It is a requirement of the Data Protection Act 2018 to notify people entering a CCTV protected area that the area is monitored by CCTV and that images are recorded. The academy is to ensure that this requirement is fulfilled.

The CCTV sign(s) should include the following:

- That the area is covered by CCTV and images are recorded.
- The purpose of using CCTV.



Appendix 3 – Camera Positions

Camera No	Camera View
1	Front Gate
2	Year 2 Playground
3	Year 1 Playground
4	Mobile by conservation area
5	EYFS Outdoor Classroom